FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Four Winds International, Inc.
701 County Road 15
Elkhart, Indiana 46515-1486

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-5814-00220	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 9, 1996
First Administrative Amendment: AAF039-8246	Pages Affected: 25, 26 Issuance Date: October 14, 1997
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Third Administrative Amendment: AAF039-9208	Pages Affected: 24, Added page 1A Issuance Date: December 3, 1997
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Significant Permit Revision: F 039-10568-00220	Pages Affected: 1, 2, 4, 6-29, 30, 31, 32 and 33 Added pages: 1a, 5a, 5b, 29a-29l, 33a and 33b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a motor home/recreational vehicle manufacturing facility.

Responsible Official:	Jeff Kime
Source Address:	701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:	P.O. Box 1486, Elkhart, Indiana 46515-1486
SIC Code:	3716
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

(a) Class C Sub-assembly areas 1A and 1B, consisting of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):
- (1) Ten (10) Welders;
- (2) Two (2) Portable Spotwelders;
- (3) One (1) Portable Plasma Cutter;
- (4) Ten (10) High Volume Low Pressure (HVLP) spray guns to apply adhesive to wood for touch up;
- (5) Two (2) Urethane adhesive applicators to apply water activated urethane adhesive to fiberglass and wood for lamination of side walls and floors; and
- (6) Hand rollers for lamination of rubber roof to fiberglass;
- (7) Two (2) acetylene torches;
- (8) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
- (9) Seven (7) metal chop saws and one (1) PVC chop saw;
- (10) One (1) metal hand drill;
- (11) One (1) metal hand router and four (4) fiberglass routers;
- (12) One (1) MIG welder;
- (13) One (1) PVC radial arm saw;
- (14) One (1) metal hand reciprocating saw; and
- (15) Eight (8) spray guns for the application of adhesive to wood.

(b) Class C Sub-assembly area 2 consists of woodworking equipment (WW) connected to two (2) cyclone dust collectors.

(c) Class C final finish area consists of the following equipment:
- (1) One (1) Spray pressure pot used for final repair on metal surfaces in the Class A line;
- (2) One (1) Spray pressure pot used for touch up repair on metal chassis surfaces in the service area;
- (3) Hand wiping operations using solvents;
- (4) Facilities used to apply caulks and sealants;
- (5) Four (4) Steel Chopsaws;
- (6) One (1) Electric Shear Press;
- (7) One (1) Cuther Hammer Press; and
- (8) One (1) Tab Notcher.

(d) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  (i) steel tube welding, identified as FA1, with a maximum capacity of 50 pounds of welding wire per hour and exhausting within the building;
  (ii) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  (i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  (i) aluminum tube welding, identified as SR1, with a maximum capacity of 25 pounds of welding wire per hour and exhausting within the building;
  (ii) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;

(4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:
  (i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;

(6) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:
  (i) One (1)spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through F-3-1;
    (A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.

(e) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  (i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;
  (ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  (i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
  (ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  (i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;
  (ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
  (iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and
  (iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

(f) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:
  (1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1; and
  (2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Natural gas fired combustion units with heat input capacities equal to or less than ten million (10,000,000) BTU per hour.
  (1) four (4) air make up units each with a rated heat input of 0.58 MMBtu per hour, identified as A-1-1 through A-1-4;
  (2) one (1) space heater with a rated heat input of 0.20 MMBtu per hour, identified as ID3;
  (3) two (2) space heaters each with a rated heat input of 0.15 MMBtu per hour, identified as ID6 and ID7;
  (4) two (2) space heaters each with a rated heat input of 0.25 MMBtu per hour, identified as ID64 and ID65;
  (5) six (6) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as ID14 and ID32 through ID53;
  (6) one (1) water heater with a rated heat input of 0.03 MMBtu per hour, identified as ID10;
  (7) five (5) air make up units each with a rated heat input of 0.56 MMBtu per hour, identified as A-2-1 through A-2-5;
  (8) one (1) space heater with a rated heat input of 0.06 MMBtu per hour, identified as H-2-1;
  (9) two (2) space heaters each with a rated heat input of 0.03 MMBtu per hour, identified as H-2-2 and H-2-3;
  (10) one (1) space heater with a rated heat input of 0.10 MMBtu per hour, identified as H-2-4;

(11) eight (8) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as H-2-5 through H-2-12;
(12) one (1) water heater with a rated heat input of 0.05 MMBtu per hour, identified as W-2-1; and
(13) one space heater with a rated heat input of 0.06 MMBtu per hour, identified as HP-3-1.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
(d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
(e) Paved and unpaved roads and parking lots with public access;
(f) The following VOC and HAP storage containers:
(1) Vessels storing lubricating oils, hydraulic coils, machining oils and machining fluids;
(g) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings;
(h) Cleaners and solvents characterized as:
(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
(i) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and
(k) Paved and unpaved roads and parking lots with public access.
(l) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
(1) steel tube welding, identified as FA1, with a maximum capacity of 50 pounds of welding wire per hour and exhausting within the building; and
(2) aluminum tube welding, identified as SR1, with a maximum capacity of 25 pounds of welding wire per hour and exhausting within the building.

A.4 FESOP Applicability [326 IAC 2-8-2]
This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.20 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM , U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(11) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Class C Sub-assembly areas 1A and 1B, consisting of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):
- (1) Ten (10) Welders;
- (2) Two (2) Portable Spotwelders;
- (3) One (1) Portable Plasma Cutter;
- (4) Ten (10) High Volume Low Pressure (HVLP) spray guns to apply adhesive to wood for touch up;
- (5) Two (2) Urethane adhesive applicators to apply water activated urethane adhesive to fiberglass and wood for lamination of side walls and floors; and
- (6) Hand rollers for lamination of rubber roof to fiberglass.;
- (7) Two (2) acetylene torches;
- (8) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
- (9) Seven (7) metal chop saws and one (1) PVC chop saw;
- (10) One (1) metal hand drill;
- (11) One (1) metal hand router and four (4) fiberglass routers;
- (12) One (1) MIG welder;
- (13) One (1) PVC radial arm saw;
- (14) One (1) metal hand reciprocating saw; and
- (15) Eight (8) spray guns for the application of adhesive to wood.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound for Class C Sub-assembly areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source, shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) All fiberglass coating and wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.1.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.1.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P^{0.67}$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC, HAP and PM limits specified in Condition D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.10 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The weight of VOCs emitted for each compliance period; and

(7) The amount and VOC content of each coating material and solvent used for fiberglass coating and wood coatings not covered by 326 IAC 8-2-12. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Hazardous Air Pollutant (HAP)

(a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.1.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]
(a) Class C Sub-assembly area 2 consists of woodworking equipment (WW) connected to two (2) cyclone dust collectors

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the woodworking operations in Class C subassembly area 2 shall not exceed 3.02 pounds per hour. Pursuant to Construction Permit 039-3373-00220, the particulate matter from the woodworking facilities in Class C subassembly area 2 shall be considered in compliance with 6-3, in lieu of a stack test, provided that:

a) visible emissions do not exceed 10% opacity; and
b) fugitive dust complies with 326 IAC 6-4.

D.2.2 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Particulate Matter Emissions

Pursuant to 326 IAC 6-3-2 (Process Operations), the two (2) cyclone dust collectors for particulate matter (PM) control shall be in operation at all times when the woodworking equipment in Sub-assembly area 2 are in operation and exhausting to the outside atmosphere.

D.2.4 Visible Emissions Notations

Visible emission notations of all exhausts to the atmosphere from cyclones and baghouses shall be performed once per working shift when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation specified in the unit specific condition prescribing visible emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Cyclone Inspections

An inspection shall be performed each calender quarter of the cyclone controlling the woodworking operation for damage. Any damaged areas shall be repaired or replaced.

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.7 Operational Parameters

That the Permittee shall maintain a daily record at the stationary source of the following values:

(a) Fan speed/current and flow rate; and

(b) Visible observations.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) The Class C final finish area consists of the following equipment:
- (1) One (1) Spray pressure pot used for final repair on metal surfaces in the Class A line;
- (2) One (1) Spray pressure pot used for touch up repair on metal chassis surfaces in the service area;
- (3) Hand wiping operations using solvents;
- (4) Facilities used to apply caulks and sealants;
- (5) Four (4) Steel Chopsaws;
- (6) One (1) Electric Shear Press;
- (7) One (1) Cuther Hammer Press; and
- (8) One (1) Tab Notcher.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compound for the Class C Final finish areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) All fiberglass coating and wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.3.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.3.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P^{0.67}$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC, HAP and PM limits specified in Conditions D.3.1, D.3.2 and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.3.7 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.9 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.3.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.10 Hazardous Air Pollutant (HAP)

(1) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.3.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1 through D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:

(i) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:

(i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:

(i) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;

(4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:

(i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;

(6) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:

(i) One (1)spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through F-3-1;

(A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compound for Class A Sub-assembly areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as

delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.
Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) All fiberglass coating and wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.4.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.4.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P 0.67$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC, HAP and PM limits specified in Condition D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the service and chassis Paint Booth SC1 are in operation.

D.4.10 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.8 Particulate Matter Overspray

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack F-3-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.11 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.4.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Hazardous Air Pollutant (HAP)

(a) To document compliance with Conditions D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.4.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(b) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:

(i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:

(i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:

(i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and

(iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the following Class A subassembly areas shall be limited as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
steel tube cutting, identified as FA3	0.63	2.99
wood and foam cutting, identified as FA4	0.09	0.80
wood cutting, identified as CC2	0.50	2.58
custom plywood cutting, identified as CC3	0.05	0.55
aluminum tube cutting, identified as SR3	0.25	1.62
wood and foam cutting, identified as SR4	0.15	1.15
custom plywood cutting, identified as SR5	0.05	0.55
hand routing, identified as SR6	0.25	1.62
wood trim cutting, identified as FF2	0.01	0.12

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) one (1) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:

(1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1,

(2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building,

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Volatile Organic Compound for the Class A Final finish areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) All fiberglass coating and wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.6.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.6.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P 0.67$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.6.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC, HAP and PM limits specified in Condition D.6.1, D.6.2 and D.6.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.6 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.6.8 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.6.9 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.6.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Hazardous Air Pollutant (HAP)

(b) To document compliance with Conditions D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.6.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.1 through D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.7 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

The modification to a motor home/recreational vehicle manufacturing operation which includes the installation of:

(a) Class C Sub-assembly areas 1A and 1B, consisting of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):
- (1) Two (2) acetylene torches;
- (2) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
- (3) Seven (7) metal chop saws and one (1) PVC chop saw;
- (4) One (1) metal hand drill;
- (5) One (1) metal hand router and four (4) fiberglass routers;
- (6) One (1) MIG welder;
- (7) One (1) PVC radial arm saw;
- (8) One (1) metal hand reciprocating saw; and
- (9) Eight (8) spray guns for the application of adhesive to wood.

(b) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:
- (1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  - (i) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;
- (2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  - (i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;
- (3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  - (i) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;
- (4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:
  - (i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;
- (5) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:
  - (i) One (1) spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through one (1) stack, F-3-1;
    - (A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.

(c) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):
- (1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  - (i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;
  - (ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
- (2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  - (i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
  - (ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;
- (3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  - (i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;
  - (ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
  - (iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and
  - (iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

(d) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:
- (1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1; and
- (2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.7.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.7.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.7.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220
Facility: Sourcewide Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1
Parameter: VOC Emissions
Limit: The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220
Facility: Sourcewide Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1
Parameter: Any Single HAP, any Combination of HAPs
Limit:
(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis.
(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1a	Column 1b	Column 2a	Column 2b	Column 1a + Column 2a	Column 1b + Column 2b
	Single HAP Usage This Month	Total HAPs Usage This Month	Single HAP Usage Previous 11 Months	Total HAPs Usage Previous 11 Months	Single HAP Usage 12 Month Total	Total HAPs Usage 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Four Winds International, Inc.
Source Location:	701 CR 15, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	F 039-5814-00220
Operation Permit Issuance Date:	December 9, 1996
Permit Revision No.:	F 039-10568-00220
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a modification application from Four Winds International, Inc. relating to the construction and operation of a modification to a motor home/recreational vehicle manufacturing operation.

History

On May 1, 1996, Four Winds International, Inc. submitted an application to the OAM requesting to add additional surface coating lines to their existing plant. Four Winds International, Inc. was issued a Federally Enforceable State Operating Permit on December 14, 1998. The following changes were agreed to as the First Significant Permit Revision to the FESOP for this motor home/recreational vehicle manufacturing operation. The changes proposed to the FESOP are located at the end of this document.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

(a) Class C Sub-assembly areas 1A and 1B, consisting of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):
- (1) Two (2) acetylene torches;
- (2) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
- (3) Seven (7) metal chop saws and one (1) PVC chop saw;
- (4) One (1) metal hand drill;
- (5) One (1) metal hand router and four (4) fiberglass routers;
- (6) One (1) MIG welder;
- (7) One (1) PVC radial arm saw;
- (8) One (1) metal hand reciprocating saw; and
- (9) Eight (8) spray guns for the application of adhesive to wood.

(b) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:
- (1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  - (i) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;
- (2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  - (i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;
- (3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  - (i) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;
- (4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:
  - (i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;
- (5) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:
  - (i) One (1) spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through one (1) stack, F-3-1;
    - (A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.

(c) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):
- (1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:
  - (i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;
  - (ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
- (2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:
  - (i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;
  - (ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;
- (3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:
  - (i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;
  - (ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and
(iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

(d) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:
(1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1; and
(2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building.

The source also includes the following insignificant activities:
(a) Natural gas fired combustion units with heat input capacities equal to or less than ten million (10,000,000) BTU per hour.
(1) four (4) air make up units each with a rated heat input of 0.58 MMBtu per hour, identified as A-1-1 through A-1-4,
(2) one (1) space heater with a rated heat input of 0.20 MMBtu per hour, identified as ID3,
(3) two (2) space heaters each with a rated heat input of 0.15 MMBtu per hour, identified as ID6 and ID7,
(4) two (2) space heaters each with a rated heat input of 0.25 MMBtu per hour, identified as ID64 and ID65,
(5) six (6) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as ID14 and ID32 through ID53,
(6) one (1) water heater with a rated heat input of 0.03 MMBtu per hour, identified as ID10,
(7) five (5) air make up units each with a rated heat input of 0.56 MMBtu per hour, identified as A-2-1 through A-2-5,
(8) one (1) space heater with a rated heat input of 0.06 MMBtu per hour, identified as H-2-1,
(9) two (2) space heaters each with a rated heat input of 0.03 MMBtu per hour, identified as H-2-2 and H-2-3,
(10) one (1) space heater with a rated heat input of 0.10 MMBtu per hour, identified as H-2-4,
(11) eight (8) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as H-2-5 through H-2-12,
(12) one (1) water heater with a rated heat input of 0.05 MMBtu per hour, identified as W-2-1, and
(13) one space heater with a rated heat input of 0.06 MMBtu per hour, identified as HP-3-1.
(b) The following VOC and HAP storage containers:
(1) Vessels storing lubricating oils, hydraulic coils, machining oils and machining fluids.
(c) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings.
(d) Cleaners and solvents characterized as:
(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi

measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons,

(f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs,

(g) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs, and

(h) Paved and unpaved roads and parking lots with public access.

(e) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

(1) steel tube welding, identified as FA1, with a maximum capacity of 50 pounds of welding wire per hour and exhausting within the building; and

(2) aluminum tube welding, identified as SR1, with a maximum capacity of 25 pounds of welding wire per hour and exhausting within the building.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit (F039-5814-00220) on December 9, 1996. The source has since received the following:

(a) First Administrative Amendment No.: 039-8246, issued on October 14, 1997;
(b) Second Administrative Amendment No.: 039-9038, issued on November 10, 1997;
(c) Third Administrative Amendment No.: 039-9208, issued on December 3, 1997; and
(d) Fourth Administrative Amendment No.: 039-9861, issued on July 8, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
3	Office Heater	11	0.33	2,750	250
6	Office Heater	8	0.83	2,750	450
7	Office Heater	8	0.83	2,750	450
10	Water Heater	2.7	0.33	750	275
14	Plant Heater	18	0.33	3,250	550
32	Plant Heater	18	0.33	3,250	550
34	Plant Heater	18	0.33	3,250	550
35	Plant Heater	18	0.33	3,250	550
64	Break Room Heater	15	0.83	3,250	550
65	Plant Heater	12	0.75	3,250	550
C1	Woodworking Cyclone	18.75	2.7	10,000	Ambient
W-2-1	Water Heater	12	0.25	3250	550
H-2-1	Office Heater	24	0.33	2750	450
H-2-2	Office Heater	24	0.33	2750	450
H-2-3	Office Heater	24	0.33	2750	450
H-2-4	Break Room Heater	15	0.5	3250	550
H-2-5	Plant Heater	12	0.25	3250	550
H-2-6	Plant Heater	12	0.25	3250	550
H-2-7	Plant Heater	12	0.25	3250	550
H-2-8	Plant Heater	12	0.25	3250	550

H-2-9	Plant Heater	12	0.25	3250	550
H-2-10	Plant Heater	12	0.25	3250	550
H-2-11	Plant Heater	12	0.25	3250	550
H-2-12	Plant Heater	12	0.25	3250	550
F-3-1	Chassis Coating	15	2.5	7,500	Ambient

Recommendation

The staff recommends to the Commissioner that the **Significant Permit Modification** be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 26, 1999. Additional information was received on March 12, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (16 pages.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	36.20
PM-10	36.20
SO_2	0.00
VOC	92.50
CO	12.60
NOx	3.10

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Glycol Ether	greater than 10
Ethylene Glycol	less than 10
Hexane	less than 10
Methanol	less than 10
Methyl Isobutyl Ketone	less than 10
Methyl Alcohol	less than 10
Methyl Ethyl Ketone	less than 10
Methylene Chloride	greater than 10
Toluene	less than 10
Vinyl Acetate	less than 10
Xylene	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 Annual Air Emission Inventory and Emission Statement Facility Report.

Pollutant	Actual Emissions (tons/year)
PM	0.01
PM-10	0.01
SO_2	0.00
VOC	0.07
CO	0.05
NO_x	0.25
HAP (specify)	0.00

Limited Potential to Emit

(a) The source has accepted a federally enforceable limit on potential to emit VOC of less than 100 tons per year, consisting of:

(i) 98.83 tons per year for the significant activities; and

(ii) 0.17 tons per year for the insignificant activities.

(b) The source has accepted a federally enforceable limit on potential to emit any single HAP of less than 10 tons per year, consisting of:

(i) 9.9 tons per year for the significant activities; and

(ii) 0.06 tons per year for the insignificant activities.

(c) The source has accepted a federally enforceable limit on potential to emit any combination of HAPs of less than 25 tons per year, consisting of:

(i) 24.0 tons per year for the significant activities; and

(ii) 0.07 tons per year for the insignificant activities.

(d) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Any Single HAP	Combination Of HAPs
aluminum tube cutting (SR3)	2.41	2.41	0.00	0.00	0.00	0.00	0.00	0.00
wood and foam cutting (SR4)	0.18	0.18	0.00	0.00	0.00	0.00	0.00	0.00
plywood cutting (SR5)	0.35	0.35	0.00	0.00	0.00	0.00	0.00	0.00
hand routing (SR6)	0.88	0.88	0.00	0.00	0.00	0.00	0.00	0.00
steel tube cutting (FA3)	2.41	2.41	0.00	0.00	0.00	0.00	0.00	0.00
wood and foam cutting (FA4)	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00
wood cutting (CC2)	3.59	3.59	0.00	0.00	0.00	0.00	0.00	0.00
custom plywood cutting (CC3)	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00
wood trim cutting (FF2)	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00
*floor assembly area steel tube welding (FA2)	1.12	1.12	0.00	0.00	0.00	0.00	0.00	0.00
*sidewall and roof aluminum tube welding (SR2)	0.56	0.56	0.00	0.00	0.00	0.00	0.00	0.00
*natural gas combustion units (new and existing)	0.23	0.23	0.02	0.17	2.60	3.10	0.00	0.00
Surface coating operations (new and existing)	14.24	14.24	0.00	98.83	0.00	0.00	9.90 (any single HAP)	24.0 (any combination of HAPs)
existing Subassembly 2	13.23	13.23	0.00	0.00	0.00	0.00	0.00	0.00
*existing Welding	2.32	2.32	0.00	0.00	0.00	0.00	0.27	0.57
Total Emissions	42.20	42.20	0.00	99.10	2.60	3.10	9.90	24.00

* These activities also qualify as insignificant activities (see Insignificant Activities).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. Since this modification will limit any single HAP less than 10 tons per twelve (12) month period and will limit a combination of HAPs to less than 25 tons per twelve (12) month period, rolled on a monthly basis, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC for Elkhart county. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (Federally Enforceable State Operating Permit Program)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source will limit sourcewide PM-10, and VOC emissions to less than 100 tons per year. The source will also limit any single HAP and total HAPs to less than 10 and 25 tons per year, respectively. The limitation will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the:

(a) modification to a motor home/recreational vehicle manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
aluminum tube cutting, identified as SR3	0.25	0.55	0.00%	0.55	1.62
wood and foam cutting, identified as SR4	0.15	0.20	8.00%	0.18	1.15
custom plywood cutting, identified as SR5	0.05	0.08	0.00%	0.08	0.55
hand routing, identified as SR6	0.25	0.20	0.00%	0.20	1.62
floor assembly area steel tube welding, identified as FA2	0.03	0.26	0.00%	0.26	0.35
steel tube cutting, identified as FA3	0.63	0.55	0.00%	0.55	2.99
wood and foam cutting, identified as FA4	0.09	0.11	0.00%	0.11	0.80
wood cutting, identified as CC2	0.50	0.82	0.00%	0.82	2.58
custom plywood cutting, identified as CC3	0.05	0.07	0.00%	0.07	0.55
sidewall and roof aluminum tube welding, identified as SR2	0.01	0.13	0.00%	0.13	0.22
wood trim cutting, identified as FF2	0.01	0.02	0.00%	0.02	0.12

PM emissions from the source are in compliance with 326 IAC 6-3-2, and the source utilizes cyclones for particulate matter control on the other emission units to comply with 326 IAC 6-3-2 (Process Operations).

(b) surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The equipment covered in this modification is not subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) which mandates that a Best Available Control Technology (BACT) analysis be performed for new facilities commencing operations after January 1, 1980 which have potential VOC emissions of 25 tons or more and are not regulated by other provisions of Article 8. The new emission units are subject to the requirements of 326 IAC 8-2-12, therefore the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-9(Miscellaneous Metal Coating)

Facilities constructed after July 1, 1990, located in any county, with potential VOC emissions greater than 15 pounds per day, coating metal parts or products under the Standard Industrial Classification Code of #37 and not coating a product limited by other section of 326 IAC 8-2 are subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray operation identified as SC1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray operation identified as SC1 is in compliance with this requirement.

326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations)

Spray operations for the floor assembly, cabinets and countertops, roofs and sidewalls, window treatment and final finishing areas, identified as FA1, CC1, SR1 and WC1 at the source are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating). Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 must use one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source uses the brush or wipe, air-assisted airless, roller coating and HVLP spray coating method for paint spray operations and adhesive application operations identified as FA1, CC1, SR1 and WC1.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The Class A Sub-assembly areas have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack F-3-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the service and chassis coating area must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment and the one (1) Class A final finish area have no applicable compliance monitoring conditions.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source has accepted federally enforceable air toxic emission limits of less than 10 tons per year for any single HAP and less than 25 tons per year for any combination of HAPs.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 6 through 9 of 16)

Changes Proposed

The following changes have been made to the FESOP:

(1) Condition A.2, Page 4 of 33
Add to the listing of emission units the following:

A.2 Emission Units and Pollution Control Summary
The stationary source consists of the following emission units and pollution control devices:

(a) **Class C** Sub-assembly areas 1A and 1B, consists of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):
~~(a)~~**(1)** Ten (10) Welders;
~~(b)~~**(2)** Two (2) Portable Spotwelders;
~~(c)~~**(3)** One (1) Portable Plasma Cutter;
~~(d)~~**(4)** Ten (10) High Volume Low Pressure (HVLP) spray guns to apply adhesive to wood for touch up;
~~(e)~~**(5)** Two (2) Urethane adhesive applicators to apply water activated urethane adhesive to fiberglass and wood for lamination of side walls and floors; ~~and~~
~~(f)~~**(6)** Hand rollers for lamination of rubber roof to fiberglass~~.~~**;**
(7) Two (2) acetylene torches;
(8) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
(9) Seven (7) metal chop saws and one (1) PVC chop saw;
(10) One (1) metal hand drill;
(11) One (1) metal hand router and four (4) fiberglass routers;
(12) One (1) MIG welder;
(13) One (1) PVC radial arm saw;
(14) One (1) metal hand reciprocating saw; and
(15) Eight (8) spray guns for the application of adhesive to wood.

(b) **Class C** Sub-assembly area 2 consists of woodworking equipment (WW) connected to ~~one (1)~~ **two (2)** cyclone dust collectors.

(c) ~~The~~ **Class C** final finish area consists of the following equipment:
~~(r)~~**(1)** One (1) Spray pressure pot used for final repair on metal surfaces in the Class A line;
~~(s)~~**(2)** One (1) Spray pressure pot used for touch up repair on metal chassis surfaces in the service area;
~~(t)~~**(3)** Hand wiping operations using solvents;
~~(u)~~**(4)** Facilities used to apply caulks and sealants;
~~(v)~~**(5)** Four (4) Steel Chopsaws;

~~(w)~~**(6)** One (1) Electric Shear Press;
~~(x)~~**(7)** One (1) Cuther Hammer Press; and
~~(y)~~**(8)** One (1) Tab Notcher.

(d) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:

(i) steel tube welding, identified as FA1, with a maximum capacity of 50 pounds of welding wire per hour and exhausting within the building;

(ii) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:

(i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:

(i) aluminum tube welding, identified as SR1, with a maximum capacity of 25 pounds of welding wire per hour and exhausting within the building;

(ii) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;

(4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:

(i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;

(6) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:

(i) One (1)spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through F-3-1;

(A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.

(e) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:

(i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:

(i) wood cutting, identified as CC2, with a maximum capacity of 1,000

pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:

(i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and

(iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

(f) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:

(1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1; and

(2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building.

(2) Condition A.3, Page 4 of 28

Add to the listing of emission units the following:

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Natural gas fired combustion units with heat input capacities equal to or less than ten million (10,000,000) BTU per hour.

(1) four (4) air make up units each with a rated heat input of 0.58 MMBtu per hour, identified as A-1-1 through A-1-4;

(2) one (1) space heater with a rated heat input of 0.20 MMBtu per hour, identified as ID3;

(3) two (2) space heaters each with a rated heat input of 0.15 MMBtu per hour, identified as ID6 and ID7;

(4) two (2) space heaters each with a rated heat input of 0.25 MMBtu per hour, identified as ID64 and ID65;

(5) six (6) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as ID14 and ID32 through ID53;

(6) one (1) water heater with a rated heat input of 0.03 MMBtu per hour, identified as ID10;

(7) five (5) air make up units each with a rated heat input of 0.56 MMBtu per hour, identified as A-2-1 through A-2-5;

(8) one (1) space heater with a rated heat input of 0.06 MMBtu per hour,

identified as H-2-1;

(9) two (2) space heaters each with a rated heat input of 0.03 MMBtu per hour, identified as H-2-2 and H-2-3;

(10) one (1) space heater with a rated heat input of 0.10 MMBtu per hour, identified as H-2-4;

(11) eight (8) space heaters each with a rated heat input of 0.10 MMBtu per hour, identified as H-2-5 through H-2-12;

(12) one (1) water heater with a rated heat input of 0.05 MMBtu per hour, identified as W-2-1; and

(13) one space heater with a rated heat input of 0.06 MMBtu per hour, identified as HP-3-1.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(e) Paved and unpaved roads and parking lots with public access;

(f) The following VOC and HAP storage containers:

(1) Vessels storing lubricating oils, hydraulic coils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other non-volatile materials applied as temporary protective coatings;

(h) Cleaners and solvents characterized as:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and

(k) Paved and unpaved roads and parking lots with public access.

(l) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:

(1) steel tube welding, identified as FA1, with a maximum capacity of 50 pounds of welding wire per hour and exhausting within the building; and

(2) aluminum tube welding, identified as SR1, with a maximum capacity of 25 pounds of welding wire per hour and exhausting within the building.

(3) The following conditions have been added or modified to Section B on page 6 through 15 of 33:

~~B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)~~
~~The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.~~

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3~~ (prior to July 1, 1996, IC 13-7-10-2.5), of the permit~~.

B.4 Enforceability [326 IAC 2-8-6]
(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9]**[326 IAC 2-8-3(h)]**
~~The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.~~

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]
(a) The provisions of this permit are severable**;**, ~~and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~ **a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.**

~~(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard.~~

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort**,** or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~(b) The Permittee shall also provide additional information as requested by IDEM, OAM, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).~~

~~(c)~~**(b)** The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

~~(d)~~**(c)** Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. ~~For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.~~ **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit **constitutes a violation of the Clean Air Act and** is grounds for:

(1) enforcement action;

(2) permit termination, revocation and reissuance or modification; and

(3) denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] **[326 IAC 2-8-5(1)]**
(a) Where specifically designated by this permit or required by an applicable requirement, ~~A~~ any application form, report, or compliance certification submitted under this permit shall contain certification by a ~~responsible official~~ **authorized individual** of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

~~A responsible official is defined at 326 IAC 2-7-1(33).~~

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
(a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance**

certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification **shall cover the time period from January 1 to December 31 of the previous year**, and shall be submitted **in letter form no later than** April 15 to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~and~~

~~United States Environmental Protection Agency, Region V~~
~~Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

(f) This annual compliance certification report required by this permit shall be **considered** timely if~~:~~ **the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.**

~~(1) Delivered by U.S. mail and postmarked on or before the date it is due; or~~

~~(2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

(c) The annual compliance certification report shall include the following:

(1) The identification of each term and condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period **consistent with 326 IAC 2-8-4(3)**; and

(5) Such other facts as **specified in Sections D of this permit,** IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]**[326 IAC 2-8-5(a)(1)]**

(a) **If required by specific condition(s) in Section D of this permit,** ~~T~~the Permittee shall prepare~~,~~ **and** maintain ~~and implement operation and~~ Preventive Maintenance Plans **(PMP)** ~~as necessary including the following information on~~ **each:within ninety (90) days after issuance of this permit, including the following information on each facility:**

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

~~(3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~

~~(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~

~~(5)~~**(3)** Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided ~~as follows:~~**in 326 IAC 2-8-12.**

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;

(4) **For each emergency lasting one (1) hour or more,** ~~T~~the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency **or after the emergency was discovered or reasonably should have been discovered**~~; occurrence by telephone or facsimile;~~

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, **Compliance Section**) or,
Telephone No.: 317-233-5674 **(ask for Compliance Section)**
Facsimile No.: 317-233-5967
Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) ~~The Permittee submitted written notice or by~~ **For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or** facsimile of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the ~~"responsible official"~~**"authorized individual"** as defined by ~~326 IAC 2-7-2(C)(33).~~**326 IAC 2-1.1-1(1).**

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes ~~any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions).~~ **326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule.** This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile ~~within four (4) daytime business hours after the beginning of the emergency~~ **of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition** shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in ~~clause~~ **(g)(2)**(B) above.

B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from **any permit** requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any ~~corrective actions~~ **response steps** or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

~~Written notification shall be submitted on the attached Deviation Occurrence Reporting Form~~s.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8**(a)**] ~~[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]~~

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a **FESOP** modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 ~~(prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner~~ **or if IDEM, OAM** determines any of the following:

(1) That ~~it~~ **this permit** contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include~~, at minimum,~~ the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(~~20~~ **21**) **and 326 IAC 2-7-1(40)**.

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-~~5~~**8**-3]

(1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) ~~Delivered by U. S. mail and postmarked on or before the date it is due; or~~ **If the date postmarked on the envelope or certified mail receipt, or**

affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

~~(C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

(2) If IDEM, OAM **upon receiving a timely and complete permit application,** fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application of Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

~~B.18 Administrative Permit Amendment [326 IAC 2-8-10]~~

~~(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).~~

~~(b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).~~

~~(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]~~

~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.~~

~~(b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).~~

~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).~~

~~(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]~~

~~B.20 Significant Permit Modification [326 IAC 2-8-11(d)]~~

~~(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~

~~(b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~

~~(c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.~~

~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.~~

~~B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]~~

~~Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.~~

B.19 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.~~22~~**20** Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions

is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

~~(2)~~**(3)** The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);

~~(3)~~**(4)** The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

~~(4)~~**(5)** The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

(g) For each such **Section 502(b)(10) of the Clean Air Act** change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the ~~"responsible official"~~ **"authorized individual"** as defined by ~~326 IAC 2-7-2(C)(33).~~**326 IAC 2-1.1-1.**

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) ~~and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d).~~**No prior notification of IDEM, OAM or U.S. EPA is required.**

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.~~23~~**21** Construction Permit Requirement [326 IAC 2~~-1~~]
~~Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).~~**Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.**

B.~~24~~**22** Inspection and Entry [326 IAC 2-8-5(a)(2)]
Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.~~25~~**24** Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.** ~~consistent with the fee schedule established in 326 IAC 2-8-16.~~

(b) Failure to pay may result in administrative enforcement action, **or** revocation of this permit~~, referral to the Office of Attorney General for collection, or other appropriate measures~~.

~~(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~

~~(d)~~**(c)** ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section),~~ **The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section),** to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

(4) The following conditions have been added or modified to Section C on page 16 through 20 of 33:

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

~~C.1 Overall Source Limit~~

~~Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAPs) from the entire source shall not exceed 9 tons per 365 day period of any individual HAP or 24 tons per 365 day period of any combination of HAPs per 365 day period. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.~~

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity **[326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following~~:~~**, unless otherwise stated in this permit:**

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of **forty percent** 40% ~~opacity~~ in ~~24 consecutive readings,~~ **any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.**

(b) ~~Visible emissions~~ **Opacity** shall not exceed **sixty percent (**60%**)** ~~opacity~~ for more than a cumulative total of 15 minutes **(sixty** (60**)** readings) ~~in a 6-hour period.~~ **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.**

C.3 Open Burning **[326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. **The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.~~4~~**5** Fugitive Dust Emissions **[326 IAC 6-4]**

~~The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.~~ **The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.**

C.~~5~~**6** Operation of Equipment [326 IAC 2-8-5(a)(4)]

~~(a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.~~

~~(b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.~~

~~(c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.~~

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(1) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring [326 IAC 2-8-5(a)(1)][326 IAC 2-8-5(a)(1)]

C.~~6~~**9** Compliance Monitoring [326 IAC 2-8-4(3)] **[326 IAC 2-8-5(a)(1)]**
Compliance with applicable requirements shall be documented **as required by this permit.** ~~in accordance with the provisions of 326 IAC 2-8-4(3).~~ The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee ~~shall notify:~~ **may extend the compliance schedule an additional ninety (90) days provided the Permittee notify:**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** with full justification of the reasons for inability to meet this date ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved~~.

The notification which shall be submitted by the Permittee does not require the certification by the ~~"responsible official"~~ **"authorized individual"** as defined by ~~326 IAC 2-7-2(C)(33).~~**326 IAC 2-1.1-1(1).**

C.~~7~~**10** Maintenance of Monitoring Equipment ~~[326 IAC 1-6]~~**[326 IAC 2-8-4(3)(A)(iii)]**

(a) ~~The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~ **In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.**

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. ~~Preventive maintenance plans of the monitors shall be implemented.~~ In addition prompt ~~correction, as indicated,~~ **corrective action** shall be initiated ~~within the time frames specified,~~ whenever **indicated.** ~~the parameters monitored fall outside of the indicated values.~~

C.~~8~~**11** Monitoring Methods [326 IAC 3]
Any monitoring or testing performed to meet the requirements of this permit shall be performed, ~~whenever applicable~~ according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, ~~as appropriate, unless some other method is specified in this permit.~~ **or other approved methods as specified in this permit.**

C.~~9~~**12** Pressure Gauge Specifications
Whenever a condition in this permit requires the ~~taking~~ **measurement** of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than **twenty percent (**20%**)** ~~percen~~t of full scale and be

accurate within **plus or minus two percent (**±2%**)** of full scale reading. ~~The instrument shall be quality assured and maintained as specified by the vendor.~~

Corrective Actions and Response Steps [326 IAC 2-8-4~~(1)~~] [326 IAC 2-8-5**(a)**(1)]

~~C.10 Failure to Take Corrective Action~~

~~For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the indicated time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.~~

~~After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:~~

~~(a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or~~

~~(b) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or~~

~~(c) An automatic measurement was taken when the process was not operating; or~~

~~(d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.~~

~~Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is

needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not

practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.~~11~~**17** Emission ~~Reporting~~ **Statement** [326 IAC 2-6] **[326 IAC 2-8-4(3)]**

(a) The Permittee shall submit a**n** ~~certified,~~ annual emission statement ~~that meets~~ **certified pursuant to** the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Data Support Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) This annual emission statement required by this permit shall be timely if~~:~~ **the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.**

(1) ~~Delivered by U.S. mail and postmarked on or before the date it is due; or~~

(2) ~~Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

C.~~12~~**18** Monitoring Data Availability

~~All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.~~

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.~~13~~**19** General Record Keeping Requirements **[326 IAC 2-8-4(3)][326 IAC 2-8-5]**

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location ~~and available within one hour upon verbal request of an IDEM, OAM representative,~~ for a minimum of three (3) years~~.~~ **and available upon the request of an IDEM, OAM, representative.** ~~They~~ **The records** may be stored elsewhere for the remaining two **(2)** years ~~providing~~ **as long as** they are made available ~~within thirty (30) days after written~~ **upon** request. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

(b) Records of required monitoring information shall include**, where applicable**:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include**, where applicable**:

(1) Copies of all reports required by this permit~~.~~;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) ~~All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;~~ **Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such**

violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

~~(5) Relevant work purchases orders;~~

~~(6) Quality assurance and quality control procedures;~~

~~(7) Operator's standard operating procedures;~~

~~(8) Manufacturer's specifications or their equivalent; and~~

~~(9) Equipment "troubleshooting" guidance.~~

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.~~14~~**20** General Reporting Requirements **[326 IAC 2-8-4(3)(C)]**

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

~~(a)~~**(b) The report required in (a) of this condition and** ~~R~~**r**eports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

~~(b)~~**(d)** Unless otherwise specified in this permit, any ~~notice,~~**quarterly** report, ~~or other submission required by this permit~~ shall be ~~timely if:~~ **submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

~~(1) Delivered by U.S. mail and postmarked on or before the date it is due; or~~

~~(2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~

~~(c)~~**(e)** All instances of deviations ~~from any requirements of this permit must be clearly identified in such reports.~~ **as described in Section B- Deviations from Permit Requirements**

Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(d)~~**(f)** Any corrective actions **or response steps** taken as a result of ~~an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions~~ **each deviation** must be clearly defined in such reports;

~~(e)~~**(g)** The first report shall cover the period commencing the date of issuance of this permit and ending ~~March 31, 1997.~~ **on the last day of the reporting period.**

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(5) Section D.1, Page 21 of 33
The equipment list in Section D.1 shall be revised as follows:

Facility Description [326 IAC 2-8-4(10)]

(a) **Class C** Sub-assembly areas 1A and 1B, consists of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):

~~(a)~~**(1)** Ten (10) Welders;
~~(b)~~**(2)** Two (2) Portable Spotwelders;
~~(c)~~**(3)** One (1) Portable Plasma Cutter;
~~(d)~~**(4)** Ten (10) High Volume Low Pressure (HVLP) spray guns to apply adhesive to wood for touch up;
~~(e)~~**(5)** Two (2) Urethane adhesive applicators to apply water activated urethane adhesive to fiberglass and wood for lamination of side walls and floors; ~~and~~
~~(f)~~**(6)** Hand rollers for lamination of rubber roof to fiberglass~~.~~**;**
(7) Two (2) acetylene torches;
(8) Two (2) bandsaws for metal and one (1) bandsaw for PVC;
(9) Seven (7) metal chop saws and one (1) PVC chop saw;
(10) One (1) metal hand drill;
(11) One (1) metal hand router and four (4) fiberglass routers;
(12) One (1) MIG welder;
(13) One (1) PVC radial arm saw;
(14) One (1) metal hand reciprocating saw; and
(15) Eight (8) spray guns for the application of adhesive to wood.

(6) The following conditions have been added or modified to Section D.1:

D.1.1 Volatile Organic Compound for **Class C** Sub-assembly ~~1A~~ **areas**

(a) ~~The volatile organic compound (VOC) delivered to the applicators shall not exceed 8.23 tons per month for the entire source. Therefore, the requirements of 326 IAC 2-7 do not apply.~~**The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.**

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) ~~Pursuant to 326 IAC 8-2-9 (Surface coating emission limitations: Miscellaneous metal coating operations), any metal coating operation shall be limited to 3.5 pounds VOC per gallon of coating less water.~~ **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.**

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 ~~must use~~ **shall utilize** one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) Any fiberglass coating or wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

~~D.1.2 Volatile Organic Compound for **Class C** Sub-assembly 1B~~

(a) ~~The volatile organic compound (VOC) delivered to the applicators shall not exceed 8.23 tons per month for the entire source. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

(b) ~~Pursuant to 326 IAC 8-2-9 (Surface coating emission limitations: Miscellaneous metal coating operations), any metal coating operation shall be limited to 3.5 pounds VOC per gallon of coating less water.~~

(c) ~~Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 must use one of the following application methods:~~

~~Airless Spray Application or High Volume Low Pressure (HVLP)~~
~~Air-Assisted Airless Spray Application~~
~~Electrostatic Spray Application~~
~~Electrostatic Bell or Disc Application~~
~~Heated Airless Spray Application~~
~~Roller Coating~~
~~Brush or Wipe Application~~
~~Dip-and-Drain Application~~

~~High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

(d) ~~Any fiberglass coating or wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.~~

D.1.~~3~~**2** Hazardous Air Pollutants

~~That the hazardous air pollutant emissions for the entire source shall be limited as follows:~~

(a) ~~The amount of any single hazardous air pollutant (HAP) delivered to the applicator plus the amount of any single hazardous air pollutant (HAP) used for clean-up shall be limited to~~

~~0.73 tons per month.~~ **The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.**

(b) ~~The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be limited to 1.95 tons per month.~~ **The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.**

Therefore, the requirements of 326 IAC 2-7 **(Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will** ~~do~~ not apply.

D.1.~~5~~**3** Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P^{0.67}$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Condition D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.~~5~~**7** Particulate Matter Overspray

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and to ensure that the liquid flow rate of the water wash is producing uniform water curtains. ~~To document compliance with D.1.4 observations shall be made daily of the overspray while one or more of the booths is in operation.~~ **To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack F-3-1 while one or more of the booths are in**

operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops ~~or~~ **and** nearby ground. The ~~Preventive Maintenance Plan~~ **Compliance Response Plan** for this unit shall contain troubleshooting contingency and ~~corrective actions for when an overspray emission, evidence of an overspray emission, or other abnormal~~ **response steps for when a noticeable change in overspray emission, or evidence of overspray** emission is observed. ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~ **The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.~~6~~**8** Volatile Organic Compound

The type and amount of coatings and solvents used, the amount of VOCs delivered to the applicator, the amount of a worst case single HAP delivered to the applicator, and the amount of any combination of HAPs delivered to the applicator must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for each coating and solvent used.

D.1.~~7~~**9** Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.~~8~~**10** Volatile Organic Compound (VOC) Usage

~~That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:~~

(1) To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

~~(a)~~ **(1)** ~~The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~ **The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

(2) A log of the dates of use;

~~(b)~~ **(3)** ~~The VOC content (weight percent) of each material used; and~~ **The volume weighted VOC content of the coatings used for each month;**

~~(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, and the amount disposed of as waste, if applicable.~~

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.~~9~~**11** Hazardous Air Pollutant (HAP)

~~That the Permittee shall maintain records at the source of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAPs emission limits established in this permit. The records shall contain a minimum of the following:~~

(a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.1.2.

~~(a)~~ **(1)** ~~The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~ **The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

(2) A log of the dates of use;

~~(b) The HAP content (weight percent) of each material used; and~~

~~(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~(d)~~**(3)** Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.~~10~~**12** ~~Quarterly Reporting~~ **Reporting Requirements**

~~That a~~ **A** quarterly summary **of the information** to document compliance ~~with operation conditions numbers~~ **with Condition** D.1.1 ~~through D.1.4~~ **and D.1.2** shall be submitted to the address listed in Section C - General Reporting Requirements, **of this permit,** ~~using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.~~ **reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

(7) Section D.2, Page 25 of 26
The equipment list in Section D.2 shall be revised as follows:

Facility Description [326 IAC 2-8-4(10)]
(c) **Class C** Sub-assembly area 2 consists of woodworking equipment (WW) connected to ~~one (1)~~ **two (2)** cyclone dust collectors.

(8) The following conditions have been added or modified to Section D.2:

D.2.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the woodworking operations **in Class C subassembly area 2** shall not exceed 3.02 pounds per hour. Pursuant to Construction Permit 039-3373-00220, the particulate matter from the woodworking facilities **in Class C subassembly area 2** shall be considered in compliance with 6-3, in lieu of a stack test, provided that:

a) visible emissions do not exceed 10% opacity; and
b) fugitive dust complies with 326 IAC 6-4.

D.2.2 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Particulate Matter Emissions

Pursuant to 326 IAC 6-3-2 (Process Operations), the two (2) cyclone dust collectors for particulate matter (PM) control shall be in operation at all times when the woodworking equipment in Sub-assembly area 2 are in operation and exhausting to the outside atmosphere.

D.2.4 Visible Emissions Notations

Visible emission notations of all exhausts to the atmosphere from cyclones and baghouses shall be performed once per working shift when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation specified in the unit specific condition prescribing visible emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Cyclone Inspections

An inspection shall be performed each calender quarter of the cyclone controlling the woodworking operation for damage. Any damaged areas shall be repaired or replaced.

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.7 Operational Parameters

That the Permittee shall maintain a daily record at the stationary source of the following values:
(a) Fan speed/current and flow rate; and
(b) Visible observations.

(9) Section D.3, Page 27 of 33
The equipment list in Section D.3 shall be revised as follows:

Facility Description [326 IAC 2-8-4(10)]

(e) The **Class C** final finish area consists of the following equipment:

~~(r)~~**(1)** One (1) Spray pressure pot used for final repair on metal surfaces in the Class A line;

~~(s)~~**(2)** One (1) Spray pressure pot used for touch up repair on metal chassis surfaces in the service area;

~~(t)~~**(3)** Hand wiping operations using solvents;

~~(u)~~**(4)** Facilities used to apply caulks and sealants;

~~(v)~~**(5)** Four (4) Steel Chopsaws;

~~(w)~~**(6)** One (1) Electric Shear Press;

~~(x)~~**(7)** One (1) Cuther Hammer Press; and

~~(y)~~**(8)** One (1) Tab Notcher.

(10) The following conditions have been added or modified to Section D.3:

D.3.1 Volatile Organic Compound for the **Class C** Final finish areas

(a) ~~The volatile organic compound (VOC) delivered to the applicators shall not exceed 8.23 tons per month for the entire source. Therefore, the requirements of 326 IAC 2-7 do not apply.~~**The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.**

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) ~~Pursuant to 326 IAC 8-2-9 (Surface coating emission limitations: Miscellaneous metal coating operations), any metal coating operation shall be limited to 3.5 pounds VOC per gallon of coating less water.~~ **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.**

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 ~~must use~~ **shall utilize** one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) Any fiberglass coating or wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.3.2 Hazardous Air Pollutants

~~That the hazardous air pollutant emissions for the entire source shall be limited as follows:~~

(a) ~~The amount of any single hazardous air pollutant (HAP) delivered to the applicator plus the amount of any single hazardous air pollutant (HAP) used for clean-up shall be limited to 0.73 tons per month.~~ **The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.**

(b) ~~The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be limited to 1.95 tons per month.~~
The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 **(Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will** ~~do~~ not apply.

D.3.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

$E = 4.10 P^{0.67}$ where E = emission rate in pounds per hour
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.3.~~5~~**7** Volatile Organic Compound

The type and amount of coatings and solvents used, the amount of VOCs delivered to the applicator, the amount of a worst case single HAP delivered to the applicator, and the amount of any combination of HAPs delivered to the applicator must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for each coating and solvent used.

D.3.~~6~~**8** Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.~~7~~**9** Volatile Organic Compound (VOC) Usage

~~That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:~~

(2) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

~~(a)~~ **(1)** ~~The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~ **The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

(2) A log of the dates of use;

~~(b)~~ **(3)** ~~The VOC content (weight percent) of each material used; and~~ **The volume weighted VOC content of the coatings used for each month;**

~~(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, and the amount disposed of as waste, if applicable.~~

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8**10** Hazardous Air Pollutant (HAP)

~~That the Permittee shall maintain records at the source of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAPs emission limits established in this permit. The records shall contain a minimum of the following:~~

(3) To document compliance with Conditions D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.3.2.

~~(a)~~ **(1)** ~~The weight of HAP-containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~ **The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

(2) A log of the dates of use;

~~(b) The HAP content (weight percent) of each material used; and~~

~~(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~(d)~~**(3)** Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9**11** ~~Quarterly~~ Reporting **Reporting Requirements**

~~That a~~ **A** quarterly summary **of the information** to document compliance ~~with operation conditions numbers~~ **with Conditions** D.3.1 through D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, **of this permit,** ~~using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.~~ **reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

(11) The following equipment and conditions have been added to the Permit as Section D.4:

Facility Description [326 IAC 2-8-4(10)]

(a) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:

- **(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:**
  - **(i) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;**
- **(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:**
  - **(i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;**
- **(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:**
  - **(i) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;**
- **(4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:**
  - **(i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;**
- **(6) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:**
  - **(i) One (1)spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through F-3-1;**
    - **(A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.**

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compound for Class A Sub-assembly areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) Any fiberglass coating or wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.4.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.4.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

E = 4.10 P 0.67 **where E = emission rate in pounds per hour**
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Condition D.4.1 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the service and chassis Paint Booth SC1 are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.8 Particulate Matter Overspray

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and to ensure that the liquid flow rate of the water wash is producing uniform water curtains. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack F-3-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 Volatile Organic Compound

The type and amount of coatings and solvents used, the amount of VOCs delivered to the applicator, the amount of a worst case single HAP delivered to the applicator, and the amount of any combination of HAPs delivered to the applicator must be monitored and

recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for each coating and solvent used.

D.4.10 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.11 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.4.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Hazardous Air Pollutant (HAP)

(a) To document compliance with Conditions D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.4.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;
(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(12) The following equipment and conditions have been added to the Permit as Section D.5:

Facility Description [326 IAC 2-8-4(10)]

(b) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):

(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:

(i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:

(i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;

(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:

(i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;

(ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;

(iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and

(iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the following Class A subassembly areas shall be limited as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
steel tube cutting, identified as FA3	0.63	2.99
wood and foam cutting, identified as FA4	0.09	0.80
wood cutting, identified as CC2	0.50	2.58
custom plywood cutting, identified as CC3	0.05	0.55
aluminum tube cutting, identified as SR3	0.25	1.62
wood and foam cutting, identified as SR4	0.15	1.15
custom plywood cutting, identified as SR5	0.05	0.55
hand routing, identified as SR6	0.25	1.62
wood trim cutting, identified as FF2	0.01	0.12

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where **E = rate of emission in pounds per hour; and**
P = process weight rate in tons per hour

D.5.2 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated.

(13) The following equipment and conditions have been added to the Permit as Section D.6:

Facility Description [326 IAC 2-8-4(10)]

(a) one (1) final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:

(1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1,

(2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building,

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Volatile Organic Compound for the Class A Final finish areas

(a) The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Compliance with this VOC limit shall render the source in compliance with 326 IAC 2-8 (FESOP).

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any metal coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: Wood furniture and cabinet coating operations), any coating of wood furniture, furnishings, or cabinets that are covered by rule 8-2-12 shall utilize one of the following application methods:

Airless Spray Application or High Volume Low Pressure (HVLP)
Air-Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coatings to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure

measured dynamically at the center of the air cap and at the air horns of the spray system.

(d) Any fiberglass coating or wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.6.2 Hazardous Air Pollutants

(a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. The HAP emission limits include emissions from solvent usage.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

D.6.3 Particulate Matter Overspray

The surface coating facilities shall comply with 326 IAC 6-3-2(c).

The equation for 326 IAC 6-3-2(c) is as follows:

E = 4.10 P 0.67 **where E = emission rate in pounds per hour**
P = process weight rate in tons per hour

Compliance Determination Requirements

D.6.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.6 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.6.7 Volatile Organic Compound

The type and amount of coatings and solvents used, the amount of VOCs delivered to the applicator, the amount of a worst case single HAP delivered to the applicator, and the amount of any combination of HAPs delivered to the applicator must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for each coating and solvent used.

D.6.8 Preventive Maintenance Plan [326 IAC 2-8-4(a)]

A Preventive Maintenance Plan in accordance with Condition B.13 of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.6.9 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.6.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Hazardous Air Pollutant (HAP)

(d) To document compliance with Conditions D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAPs emission limits established in Condition D.6.2.

(1) The amount and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Identification of the facility or facilities associated with the usage of each HAP.

(4) The total HAPs usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.6.1 through D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.7 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

The modification to a motor home/recreational vehicle manufacturing operation which includes the installation of:

(a) Class C Sub-assembly areas 1A and 1B, consisting of the following welding/cutting equipment (W1 & W2) and laminating equipment (L1 -L4):

- **(1) Two (2) acetylene torches;**
- **(2) Two (2) bandsaws for metal and one (1) bandsaw for PVC;**
- **(3) Seven (7) metal chop saws and one (1) PVC chop saw;**
- **(4) One (1) metal hand drill;**
- **(5) One (1) metal hand router and four (4) fiberglass routers;**
- **(6) One (1) MIG welder;**
- **(7) One (1) PVC radial arm saw;**
- **(8) One (1) metal hand reciprocating saw; and**
- **(9) Eight (8) spray guns for the application of adhesive to wood.**

(b) Class A Sub-assembly areas, consisting of the following welding/cutting equipment and laminating equipment:

- **(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:**
  - **(i) one (1) adhesive application operation, identified as FA1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;**
- **(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:**
  - **(i) one (1) adhesive application operation, identified as CC1, with a maximum capacity of 2 wood frames per hour, utilizing hand and airless spray application system and exhausting within the building;**
- **(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:**
  - **(i) One (1) adhesive application operation, identified as SR1, with a maximum capacity of 2 wood frames per hour, utilizing airless spray, hand, roll coat and flow coat application systems and exhausting within the building;**
- **(4) one (1) window covering assembly area with a maximum capacity of 77 pounds of wood and fabric per hour and consisting of:**
  - **(i) one (1)spray operation, identified as WC1, with a maximum capacity of 2 fabric and wood units per hour, utilizing an HVLP application system, exhausting within the building and consisting of three (3) High Volume Low Pressure (HVLP) spray guns;**
- **(5) one (1) service and chassis coating area with a maximum throughput of 4.5 metal frames per hour and consisting of:**
  - **(i) One (1) spray operation, identified as SC1, with a maximum capacity of 4.5 metal frames per hour, utilizing a HVLP application system and dry filters for overspray control, exhausting through one (1) stack, F-3-1;**
    - **(A) Two (2) High Volume Low Pressure (HVLP) spray guns, identified as SG3-1 and SG3-2.**

(c) Class A Sub-assembly areas consisting of metal, fabric, and woodworking equipment (WW):

- **(1) one (1) floor assembly area with a maximum capacity of 1,691 pounds of steel tube, plywood and foam insulation per hour and consisting of:**
  - **(i) steel tube cutting, identified as FA3, with a maximum capacity of 1,250 pounds of steel tube per hour and exhausting within the building;**
  - **(ii) wood and foam cutting, identified as FA4, with a maximum capacity of 175 pounds of hardwood and foam insulation per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;**
- **(2) one (1) cabinet and countertop assembly area with a maximum capacity of 1,085 pounds of wood per hour and consisting of:**
  - **(i) wood cutting, identified as CC2, with a maximum capacity of 1,000 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;**
  - **(ii) custom plywood cutting, identified as CC3, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building;**
- **(3) one (1) sidewall and roof assembly area with a maximum capacity of 1,638 pounds of wood and metal per hour and consisting of:**
  - **(i) aluminum tube cutting, identified as SR3, with a maximum capacity of 500 pounds of aluminum tube per hour and exhausting within the building;**
  - **(ii) wood and foam cutting, identified as SR4, with a maximum capacity of 300 pounds of wood and foam per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building;**
  - **(iii) custom plywood cutting, identified as SR5, with a maximum capacity of 100 pounds of plywood insulation per hour and exhausting within the building; and**
  - **(iv) hand routing, identified as SR6, with a maximum capacity of 500 pounds of plywood insulation per hour, utilizing a cyclone (C4) as particulate control and exhausting within the building.**

(d) Class A final finish area with a maximum capacity of 48,019 pounds per hour of unfinished motor homes per hour, utilizing a cyclone (C3) as particulate control and consisting of:

- **(1) one (1) adhesive application operation, identified as FF1, with a maximum capacity of 2 unfinished motor homes per hour, utilizing caulk, airless/aerosol, and air assisted application systems and dry filters for overspray control and exhausting through stack F-3-1; and**
- **(2) wood trim cutting, identified as FF2, with a maximum capacity of 10 pounds of wood per hour, utilizing a cyclone (C3) as particulate control and exhausting within the building.**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.7.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.7.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.7.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

~~State Form 47738 (5-96)~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:
FESOP No.: F039-5814-00220

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

~~**9** Deviation Occurrence Reporting Form (For Control Equipment Monitoring)~~

~~**9** Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)~~

~~**9** Relocation Notification~~

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

~~I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.~~ **I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**

Signature:

Printed Name:

Title/Position:

Date:

~~State Form 47739 (5-96)~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

~~(For Control Equipment Monitoring Only)~~

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:
FESOP No.: F039-5814-00220

~~A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.~~
~~Stack/Vent ID:~~
~~Control Equipment:~~ ~~(ex: thermal oxidizer, scrubber, baghouses)~~
~~Type of Parameter Monitored:~~ ~~(ex: temperature, pressure drop, efficiency)~~
~~**9** Continuously **9** Periodically, at a frequency of:~~
~~Parameter Operating Restrictions/Range:~~ ~~(ex: 1,400°F, 2-4 psi pressure drop)~~
~~Report Covers From: To:~~ ~~(date: month/day/yr)~~
~~**9** No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.~~
~~**9** Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.~~

~~———~~	~~For Parameter Recorded Continuously~~	~~For Parameter Recorded Periodically~~
~~Total Unit Operating Time~~		
~~Total Time of Deviations (Identify All Deviations)~~		
~~Percent of Time Indicating Deviations ([2]/[1]x100)~~		

~~Date of Deviation~~	~~Start/Stop Time of Deviation (Continuous Monitoring Only)~~	~~Actual Value Recorded~~	~~Reason for Deviation & Corrective Action Taken~~

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~State Form 47741 (5-96)~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address:
FESOP No.: F039-5814-00220
Facility: ~~Sub-assembly areas 1A & 1B, and Final finish area~~ **Sourcewide**
Parameter: VOC usage
Limit: ~~Total source VOC: 8.23 tons VOC per month~~
~~Single worst HAP: 0.73 tons per month, Total HAPs: 1.95 tons per month~~

The usage of VOC delivered to the applicators, including clean up solvents, for the entire source shall be limited to 98.83 tons per twelve (12) month consecutive period, rolled on a monthly basis.

Year: _____

Month	Facility	VOC Usage (tons/month)	Single Worst Case HAP Usage (tons/month)	Total HAPs Usage (tons/month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220
Facility: Sourcewide Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1
Parameter: Any Single HAP, any Combination of HAPs
Limit: (a) The total usage of any single HAP, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide single HAP is limited to less than 10 tons per twelve (12) consecutive month period, rolled on a monthly basis.

(b) The total usage of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, for the entire source shall be limited such that a sourcewide combination of HAPs is limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1a	Column 1b	Column 2a	Column 2b	Column 1a + Column 2a	Column 1b + Column 2b
	Single HAP Usage This Month	Total HAPs Usage This Month	Single HAP Usage Previous 11 Months	Total HAPs Usage Previous 11 Months	Single HAP Usage 12 Month Total	Total HAPs Usage 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Four Winds International, Inc.
Source Address: 701 County Road 15, Elkhart, Indiana 46515-1486
Mailing Address: 701 County Road 15, Elkhart, Indiana 46515-1486
FESOP No.: F039-5814-00220

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The operation of this motor home/recreational vehicle manufacturing facility shall be subject to the conditions of the attached proposed **Significant Permit Revision to FESOP Permit No. F 039-10568-00220.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Permit Revision to a Federally Enforceable State Operating Permit

Source Name:	Four Winds International, Inc.
Source Location:	701 CR 15, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3716
Operation Permit No.:	F 039-5814-00220
Permit Reviewer:	Phillip Ritz/EVP

On April 26, 1999, the Office of Air Management (OAM) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Four Winds International, Inc. had applied for a Permit Revision to a Federally Enforceable State Operating Permit to construction and operation of a modification to a motor home/recreational vehicle manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 10, 1999, Kevin Parks submitted comments on behalf of Four Winds International, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

COMMENT 1

Please be advised that Four Winds International, Inc. objects to Section C.13 of the permit, the requirement of an Emergency Reduction Plan. Since Four Winds International, Inc. is limited to emissions less than 100 tons per year, the source is in a synthetic minor status with respect to its emission rate. The actual emissions of this source are expected to be far less than the emissions associated with a major source. Therefore, Four Winds International, Inc. requests that this requirement be removed from the final permit as being unduly burdensome.

RESPONSE 1

Pursuant to 326 IAC 1-5-2, Emergency Reduction Plans are required of, "All persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant..." The sourcewide potential to emit any criteria pollutant is less than 100 tons per year (by virtue of the attached FESOP), therefore, an Emergency Reduction Plan is not required for this source. Condition C.13 "Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~
~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Management~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days from the date of issuance of this permit.~~
~~The ERP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

Upon further review, the OAM has decided to make the following revisions to the permit (**bolded** language has been added, the language with a ~~line~~ through it has been deleted).

1. On page 23 of 33 under Condition D.1.10, this subpart does not contain record keeping requirement sufficient to document compliance with the requirements identified in Condition D.1.1 (d). Condition D.1.1(d) states that "All fiberglass coating and wood coating not covered by 326 IAC 8-2-12, shall have a VOC input to the operation less than 24 tons per year." Therefore, the requirements of 326 IAC 8-1-6 do not apply. Additional language has been added to Condition D.1.10 to document compliance with Condition D.1.1(d).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.10 Volatile Organic Compound (VOC) Usage

To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; ~~and~~

(6) The weight of VOCs emitted for each compliance period~~.~~**; and**

(7) The amount and VOC content of each coating material and solvent used for fiberglass coating and wood coatings not covered by 326 IAC 8-2-12. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

Appendix A: Emission Calculations
Summary of Emissions for Modification to Source
Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1	Class A Subassembly Operations SR3, SR4, SR5, SR6, FA3, FA4, CC2, CC3 and FF2	Welding Operations FA2	Welding Operations SR2	Natural Gas Combustion	**TOTAL**
PM	23.07	11.21	1.12	0.56	0.23	36.2
PM10	23.07	11.21	1.12	0.56	0.23	36.2
SO2	0.00	0.00	0.00	0.00	0.02	0.0
NOx	0.00	0.00	0.00	0.00	3.07	3.1
VOC	92.37	0.00	0.00	0.00	0.17	92.5
CO	0.00	0.00	0.00	0.00	2.58	2.6
total HAPs	52.99	0.00	0.04	0.02	0.00	53.1
all single HAP	18.18 (glycol ether)	0.00	0.04 (Manganese)	0.022 (Manganese)	0.00	18.18 (glycol ether)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1	Class A Subassembly Operations SR3, SR4, SR5, SR6, FA3, FA4, CC2, CC3 and FF2	Welding Operations FA2	Welding Operations SR2	Natural Gas Combustion	**TOTAL**
PM	9.83	10.51	1.12	0.56	0.23	22.3
PM10	9.83	10.51	1.12	0.56	0.23	22.3
SO2	0.00	0.00	0.00	0.00	0.02	0.0
NOx	0.00	0.00	0.00	0.00	3.07	3.1
VOC	40.84	0.00	0.00	0.00	0.17	41.0
CO	0.00	0.00	0.00	0.00	2.58	2.6
total HAPs	23.43 (any combination of HAPs)	0.00	0.04	0.02	0.00	24.0 (any combination of HAPs)
all single HAP	9.9 (any single HAP)	0.00	0.04 (Manganese)	0.022 (Manganese)	0.00	9.9 (any single HAP)

Total emissions based on rated capacity at 8,760 hours/year, after control.
These emission calculations do not include the existing emission units.
Any single HAP emissions from surface coating operations sourcewide have been limited to less than 10 tpy.
Total HAP emissions from surface coating operations sourcewide have been limited to less than 25 tpy.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 CR 15, Elkhart, IN 46516**
FESOP/ENSR: **039-10568-00220**
Reviewer: **Phillip Ritz/EVP**
Date: **2/1/99**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Roofs/Sidewalls																
Dynasolve CU5	8.8	97.00%	0.0%	97.0%	0.0%	0.00%	0.00060	2.500	8.57	8.57	0.01	0.31	0.06	0.00	ERR	100%
Ethanol	6.8	94.69%	0.0%	94.7%	0.0%	0.00%	0.17810	2.500	6.41	6.41	2.85	68.50	12.50	0.00	ERR	100%
260 Uniplex	10.5	0.00%	0.0%	0.0%	0.0%	100.00%	0.00290	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
9014 Adhesive	8.8	0.00%	0.0%	0.0%	0.0%	100.00%	0.26070	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Adco seal	7.3	37.00%	0.0%	37.0%	0.0%	20.00%	0.07080	2.500	2.69	2.69	0.48	11.41	2.08	0.00	13.43	100%
Self-Level Sealant	11.3	31.00%	0.0%	31.0%	0.0%	72.00%	0.14160	2.500	3.49	3.49	1.24	29.66	5.41	0.00	4.85	100%
Morad M724	11.5	27.00%	19.6%	7.4%	27.0%	73.00%	0.14160	2.500	1.17	0.85	0.30	7.24	1.32	0.00	1.17	100%
Stay Put IV Adhesive	7.6	83.00%	0.0%	83.0%	0.0%	10.10%	0.04480	2.500	6.30	6.30	0.71	16.93	3.09	0.16	62.37	75%
Dicor Adhesive	8.4	60.00%	60.0%	0.0%	60.4%	39.60%	0.38430	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
PS 114R Adhesive	8.9	0.00%	0.0%	0.0%	0.0%	100.00%	5.34300	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
State Potential Emissions			**Add all coating to all solvents**								**5.59**	**134.05**	**24.46**	**0.16**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 CR 15, Elkhart, IN 46516**
FESOP/ENSR: **039-10568-00220**
Reviewer: **Phillip Ritz/EVP**
Date: **2/1/99**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Window Treatment																
Bostik Supertak	6.4	30.00%	0.0%	30.0%	0.0%	22.30%	0.17100	2.500	1.92	1.92	0.82	19.70	3.60	2.10	8.61	75%
State Potential Emissions			**Add all coating to all solvents**								**0.82**	**19.70**	**3.60**	**2.10**		

Material **Final Finish**	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Chemtech Adhesive	11.0	5.00%	0.0%	5.0%	0.0%	30.50%	0.22440	2.500	0.55	0.55	0.31	7.41	1.35	6.43	1.80	75%
Colorimetric Caulk	8.3	34.80%	0.0%	34.8%	0.0%	60.00%	0.14160	2.500	2.90	2.90	1.03	24.66	4.50	0.00	4.84	100%
Cyuclo glass Cleaner	8.3	99.90%	87.0%	12.9%	87.0%	0.00%	0.01610	2.500	8.28	1.08	0.04	1.04	0.19	0.00	ERR	75%
DAP Paint	8.7	95.00%	0.0%	95.0%	0.0%	10.00%	0.04740	2.500	8.24	8.24	0.98	23.42	4.27	0.06	82.37	75%
Foam Glass Cleaner	8.3	99.90%	91.9%	8.0%	91.9%	0.00%	0.01270	2.500	8.24	0.67	0.02	0.51	0.09	0.00	ERR	75%
Image Glass Cleaner	8.3	100.00%	64.0%	36.0%	64.0%	0.00%	0.00130	2.500	8.34	3.00	0.01	0.23	0.04	0.00	ERR	75%
Max Clean	8.3	98.00%	88.0%	10.0%	88.0%	2.00%	0.02830	2.500	6.95	0.83	0.06	1.42	0.26	0.01	41.70	75%
Mineral Spirirts	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.03910	2.500	6.49	6.49	0.63	15.23	2.78	0.00	ERR	100%
Russell CM911	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.03860	2.500	7.01	7.01	0.68	16.24	2.96	0.00	ERR	100%
8022 Red	7.0	96.20%	0.0%	96.2%	0.0%	0.00%	0.02060	2.500	6.77	6.77	0.35	8.37	1.53	0.00	ERR	100%
114 Solvent	7.1	91.50%	0.0%	91.5%	0.0%	0.00%	0.00170	2.500	6.48	6.48	0.03	0.66	0.12	0.00	ERR	100%
S1241 Solvent	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.07110	2.500	6.41	6.41	1.14	27.35	4.99	0.00	ERR	100%
State Potential Emissions			**Add all coating to all solvents**								**5.27**	**126.53**	**23.09**	**6.50**		

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 CR 15, Elkhart, IN 46516**
FESOP/ENSR: **039-10568-00220**
Reviewer: **Phillip Ritz/EVP**
Date: **2/1/99**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Service and Chassis																
4914 WEC	8.4	69.29%	53.9%	15.4%	54.6%	26.34%	1.09000	4.500	2.88	1.30	6.40	153.59	28.03	13.94	4.95	75%

State Potential Emissions **Add all coating to all solvents** **6.40** **153.59** **28.03** **13.94**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Floor Assembly																
Stay Put IV Adhesive	7.6	85.00%	0.0%	85.0%	0.0%	10.1%	0.0448	2.500	6.45	6.45	0.72	17.34	3.16	0.14	63.88	75%
Russell 676 Adhesive	5.7	82.30%	0.0%	82.3%	0.0%	12.3%	0.0365	2.500	4.69	4.69	0.43	10.27	1.87	0.10	38.14	75%
Adco Sealant	7.3	37.00%	0.0%	37.0%	0.0%	20.0%	0.0708	2.500	2.69	2.69	0.48	11.41	2.08	0.00	13.43	100%
State Potential Emissions			**Add all coating to all solvents**								**1.63**	**39.03**	**7.12**	**0.24**		

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Cabinets/Countertops																
Rezwood Adhesive	9.3	57.00%	57.0%	0.0%	63.6%	36.4%	0.2674	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
MIneral Spirits	6.5	100.00%	0.0%	100.0%	0.0%	0.0%	0.0391	2.500	6.49	6.49	0.63	15.23	2.78	0.00	ERR	100%
Stay Put IV Adhesive	7.6	85.00%	0.0%	85.0%	0.0%	10.1%	0.0448	2.500	6.45	6.45	0.72	17.34	3.16	0.14	63.88	75%
114 Solvent	7.1	91.50%	0.0%	91.5%	0.0%	0.0%	0.0017	2.500	6.48	6.48	0.03	0.66	0.12	0.00	ERR	100%
State Potential Emissions			**Add all coating to all solvents**								**1.38**	**33.23**	**6.06**	**0.14**		

Total Potential to	**21.09**	**506.12**	**92.37**	**23.07**	

*Material Usage Limitation (%)	Control Efficiency VOC	Control Efficiency PM	Limited VOC Pounds per Hour	Limited VOC Pounds per Day	Limited VOC Tons per Year	Controlled PM tons per Year
55.78%	0.00%	**0.00%**	**9.33**	**223.81**	**40.84**	**23.07**

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used
*Material Usage Limitation represents limitations on HAPs.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ether	Weight % Hexane	Weight % Ethylene Glycol	Weight % Methylene Chloride	Weight % Methanol	Weight % Methyl Alcohol	Weight % Methly Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)	Methly Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
Roofs/Sidewalls																									
Dynasolve CU5	8.8	0.00060	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ethanol	6.8	0.17810	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.32	0.00	0.00
260 Uniplex	10.5	0.00290	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9014 Adhesive	8.8	0.26070	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Adco sealant	7.3	0.07080	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Self-Level Sealant	11.3	0.14160	2.500	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Morad M724	11.5	0.14160	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Stay Put IV Adhesive	7.6	0.04480	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dicor Adhesive	8.4	0.38430	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PS 114R Adhesive	8.9	5.34300	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions															**0.00**	**3.49**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.32**	**0.00**	**0.00**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

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FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ether	Weight % Hexane	Weight % Ethylene Glycol	Weight % Methylene Chloride	Weight % Methanol	Weight % Methyl Alcohol	Weight % Methly Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)	Methly Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
Window Treatment																									
Bostik Supertak	6.4	0.17100	2.500	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	4.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00
															0.00	**0.00**	**0.00**	**4.79**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Final Finish																									
Chemtech Adhesive	11.0	0.22440	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	65.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	17.58	0.00	0.00	0.00	0.00	0.00
Colorimetric Caulk	8.3	0.14160	2.500	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyuclo glass Cleaner	8.3	0.01610	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DAP Paint	8.7	0.04740	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.36	0.00	0.00
Foam Glass Cleaner	8.3	0.01270	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Image Glass Cleaner	8.3	0.00130	2.500	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Max Clean	8.3	0.02830	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
lineral Spirirts (texsolve	6.5	0.03910	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Russell CM911	7.0	0.03860	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8022 Reducer	7.0	0.02060	2.500	0.00%	29.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
114 Solvent	7.1	0.00170	2.500	0.90%	29.00%	0.00%	0.00%	0.00%	0.00%	9.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00
S1241 Solvent	6.4	0.07110	2.500	0.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions															**5.17**	**0.95**	**0.00**	**0.00**	**0.01**	**17.58**	**0.01**	**0.01**	**0.36**	**0.01**	**0.00**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ether	Weight % Hexane	Weight % Ethylene Glycol	Weight % Methylene Chloride	Weight % Methanol	Weight % Methyl Alcohol	Weight % Methly Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)	Methly Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
Painting Booth																									
4914 WEC	8.5	1.09000	4.500	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	18.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions															**0.00**	**0.00**	**18.18**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ether	Weight % Hexane	Weight % Ethylene Glycol	Weight % Methylene Chloride	Weight % Methanol	Weight % Methyl Alcohol	Weight % Methly Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)	Methly Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
Floor Assembly																									
Stay Put IV Adhesive	7.6	0.0448	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Russell 676 Adhesive	5.7	0.0365	2.500	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Adco Sealant	7.3	0.0708	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
															0.00	**0.00**	**0.00**	**0.91**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ether	Weight % Hexane	Weight % Ethylene Glycol	Weight % Methylene Chloride	Weight % Methanol	Weight % Methyl Alcohol	Weight % Methly Ethyl Ketone	Weight % Methyl Isobutyl Ketone	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Alcohol Emissions (ton/yr)	Methly Ethyl Ketone Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
Cabinets/Countertops																									
Rezwood Adhesive	9.3	0.2674	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.50%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.14
MIneral Spirits	6.5	0.0391	2.500	0.00%	0.00%	0.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Stay Put IV Adhesive	7.6	0.0448	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
114 Solvent	7.1	0.0017	2.500	0.90%	29.00%	0.00%	0.00%	0.00%	0.00%	9.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00
Total State Potential Emissions															**0.00**	**0.04**	**0.00**	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.01**	**0.14**

Total Potential to Emit any single HAP for all surface coating operations	**5.17**	**4.48**	**18.18**	**5.70**	**0.01**	**17.58**	**0.02**	**0.01**	**1.68**	**0.01**	**0.14**

Total Potential to Emit a combination of HAPs for all surface coating operations **52.99**

	Material Usage Limitation (%)	Limited Xylene Emissions per Year	Limited Toluene Emissions per Year	Limited Glycol Ether Emissions per Year	Limited Hexane Emissions per Year	Limited Ethylene Glycol Emissions per Year	Limited Methylene Chloride Emissions per Year	Limited Methanol Emissions per Year	Limited Methyl Alcohol Emissions per Year	Limited Methly Ethyl Ketone Emissions per Year	Limited Methyl Isobutyl Ketone Emissions per Year	Limited Vinyl Acetate Emissions per Year
Total Limited Potential to Emit any single HAP for all surface coating operations	**55.78%**	**2.29**	**1.98**	**8.04**	**2.52**	**0.00**	**7.78**	**0.01**	**0.01**	**0.74**	**0.00**	**0.06**

Total Limited Potential to Emit a combination of HAPs for all surface coating operations **23.43**

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Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Aluminum Cutting- SR3								
Chop Saw	Roof/Sidewalls	None	Aluminum	0.25	8	0.25	20	0.0058
Chop Saw	Roof/Sidewalls	None	Aluminum	0.25	8	0.25	20	0.0058
Chop Saw	Roof/Sidewalls	None	Aluminum	0.25	8	0.25	20	0.0058
Chop Saw	Roof/Sidewalls	None	Aluminum	0.25	8	0.25	20	0.0058
Chop Saw	Roof/Sidewalls	None	Aluminum	0.25	8	0.25	20	0.0058
Hand Drill	Roof/Sidewalls	None	Aluminum	0.0491	24	0.125	10	0.0009
Hand Router	Roof/Sidewalls	None	Aluminum	0.25	48	0.125	10	0.0087

Dust Generated	Cubic Feet	0.0385
Dust Specific Gravity		1.75
Percent Dust <100u		7.50%
Control Efficiency (Intergral for Woodworking only)		0.00%
Dust Generated	Pounds/Hour	0.55

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
13.2	2.41	0.00%	13.20	2.41

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Fiberglass Routing SR4								
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036
Hand Router	Roof/Sidewalls	Cyclone C4	FRP	0.125	396	0.125	1	0.0036

Dust Generated	Cubic Feet	0.0215
Dust Specific Gravity		0.2638
Percent Dust <100u		3.50%
Control Efficiency (Intergral for Woodworking only)		0.00%
Dust Generated	Pounds/Hour	0.2

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
4.8	0.88	80.00%	0.96	0.18

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Wood Cutting-SR5								
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Roof/Sidewalls	None	Wood	0.25	120	0.125	5	0.0109
Hand Saw	Roof/Sidewalls	None	Wood	0.125	96	1.5	5	0.0521

Dust Generated	Cubic Feet	0.1389
Dust Specific Gravity		0.2638
Percent Dust <100u		3.50%
Control Efficiency (Intergral for Woodworking only)		0.00%
Dust Generated	Pounds/Hour	0.08

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
1.92	0.35	0.00%	1.92	0.35

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Wood Cutting-SR6								
Band Saw	Roof/Sidewalls	Cyclone C3	Wood	0.0625	12	1.5	25	0.0163
Belt Sander	Roof/Sidewalls	Cyclone C3	Wood	0.0625	6	0.125	25	0.0007
Chop Saw	Roof/Sidewalls	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Roof/Sidewalls	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Radial Arm Saw	Roof/Sidewalls	Cyclone C3	Wood	0.25	12	1.5	25	0.0651
Table Saw	Roof/Sidewalls	Cyclone C3	Wood	0.25	96	0.5	25	0.1736

Dust Generated	Cubic Feet	0.3425
Dust Specific Gravity		0.2638
Percent Dust <100u		3.50%
Control Efficiency (Intergral for Woodworking only)		80.00%
Dust Generated	Pounds/Hour	0.2

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
4.8	0.88	0.00%	4.80	0.88

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 CR 15, Elkhart, IN 46516**
FESOP/ENSR: **039-10568-00220**
Reviewer: **Phillip Ritz/EVP**
Date: **2/1/99**

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Steel Cutting-FA3								
Band Saw	Floor Assembly	None	Steel	0.0625	12	0.25	10	0.0011
Chop Saw	Floor Assembly	None	Steel	0.25	8	0.25	20	0.0058
Chop Saw	Floor Assembly	None	Steel	0.25	8	0.25	20	0.0058
Chop Saw	Floor Assembly	None	Steel	0.25	8	0.25	20	0.0058
Chop Saw	Floor Assembly	None	Steel	0.25	8	1.5	20	0.0347

Dust Generated	Cubic Feet							0.0532
Dust Specific Gravity								2.2
Percent Dust <100u								7.50%
Control Efficiency (Intergral for Woodworking only)								0.00%
Dust Generated	Pounds/Hour							0.55

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
13.2	**2.41**	**0.00%**	**13.20**	**2.41**

Wood Cutting-FA4								
Radial Arm Saw	Floor Assembly	Cyclone C3	Wood	0.25	12	1.5	25	0.0651

Dust Generated	Cubic Feet							0.0651
Dust Specific Gravity								0.2638
Percent Dust <100u								3.50%
Control Efficiency (Intergral for Woodworking only)								80.00%
Dust Generated	Pounds/Hour							0.04

Wood Cutting-FA4								
Hand Router	Floor Assembly	None	Wood	0.25	120	0.125	5	0.0109
Hand Saw	Floor Assembly	None	Wood	0.125	96	1.5	5	0.0521
Hand Saw	Floor Assembly	None	Wood	0.125	96	1.5	5	0.0521

Dust Generated	Cubic Feet							0.1150
Dust Specific Gravity								0.2638
Percent Dust <100u								3.50%
Control Efficiency (Intergral for Woodworking only)								0.00%
Dust Generated	Pounds/Hour							0.07

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
1.68	**0.31**	**0.00%**	**1.68**	**0.31**

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Wood Dust to Cyclone by Process-CC2								
Band Saw	Cabinets/Counter	Cyclone C3	Wood	0.0625	12	1.5	25	0.0163
Band Saw	Cabinets/Counter	Cyclone C3	Wood	0.0625	12	1.5	25	0.0163
Belt Sander	Cabinets/Counter	Cyclone C3	Wood	0.0625	6	0.125	25	0.0007
Belt Sander	Cabinets/Counter	Cyclone C3	Wood	0.0625	6	0.125	25	0.0007
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Chop Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	8	1.5	25	0.0434
Radial Arm Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	12	1.5	25	0.0651
Table Drill	Cabinets/Counter	Cyclone C3	Wood	0.25	24	0.25	25	0.0217
Table Router	Cabinets/Counter	Cyclone C3	Wood	0.25	120	0.25	25	0.1085
Table Router	Cabinets/Counter	Cyclone C3	Wood	0.25	120	0.25	25	0.1085
Table Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	96	0.5	25	0.1736
Table Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	96	0.5	25	0.1736
Table Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	96	0.5	25	0.1736
Table Saw	Cabinets/Counter	Cyclone C3	Wood	0.25	96	0.5	25	0.1736

Dust Generated	Cubic Feet	1.4228
Dust Specific Gravity		0.2638
Percent Dust <100u		3.50%
Control Efficiency (Intergral for Woodworking only)		80.00%
Dust Generated	Pounds/Hour	0.82

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
19.68	**3.59**	**0.00%**	**19.68**	**3.59**

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Fugitive Wood Dust by Process-CC3								
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.25	120	0.125	5	0.0109
Hand Router	Cabinets/Counter	None	Wood	0.0625	96	0.25	5	0.0043
Hand Router	Cabinets/Counter	None	Wood	0.0625	96	0.25	5	0.0043
Jig Saw	Cabinets/Counter	None	Wood	0.125	12	1	5	0.0043

Dust Generated Cubic Feet	0.1215
Dust Specific Gravity	0.2638
Percent Dust <100u	3.50%
Control Efficiency (Intergral for Woodworking only)	0.00%
Dust Generated Pounds/Hour	0.07

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
1.68	**0.31**	**0.00%**	**1.68**	**0.31**

Equipment Type	Department	Control Device	Substrate	Cut Area Thickness Inches	Max Length Cut Inches	Max Board Thickness Inches	Maximum Cuts Per Hour	Dust Per Hour Cubic Feet
Wood Cutting-FF2								
Chop Saw	Final Finish	Cyclone C3	Wood	0.25	8	1.5	25	0.0434

Dust Generated Cubic Feet	0.0434
Dust Specific Gravity	0.2638
Percent Dust <100u	3.50%
Control Efficiency (Intergral for Woodworking only)	80.00%
Dust Generated Pounds/Hour	0.02

Potential PM Pounds per Day	Potential PM tons per Year	Control Efficiency %	Controlled PM Pounds per Day	Controlled PM tons per Year
0.48	**0.09**	**0.00%**	**0.48**	**0.09**

	Potential PM Pounds per Day	Potential PM tons per Year		Controlled PM Pounds per Day	Controlled PM tons per Year
Total Class A Subassembly Emissions	**61.44**	**11.2128**		**57.6**	**10.512**

Appendix A: Welding and Thermal Cutting

Company Name: **Four Winds International, Inc.**
Address City IN Zip: **701 CR 15, Elkhart, IN 46516**
FESOP/ENSR: **039-10568-00220**
Reviewer: **Phillip Ritz/EVP**
Date: **2/1/99**

PROCESS WELDING	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(E70S)FA2	5	10		0.0051	0.0002		0	0.255	0.01	0.000	0	0.010
Metal Inert Gas (MIG)(E70S)SR2	5	5		0.0051	0.0002		0	0.128	0.005	0.000	0	0.005
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.38	0.02	0.00	0.00	0.02
Potential Emissions lbs/day								9.18	0.36	0.00	0.00	0.36
Potential Emissions tons/year								**1.68**	0.07	0.00	0.00	0.07

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.0	61.4

Heat Input Capacity includes:
New Units for Class A Mobile Home Manufacturing

0.56 mmBtu Air Make Up Unit A-2-1	0.03 mmBtu Space Heater H-2-2
0.56 mmBtu Air Make Up Unit A-2-2	0.03 mmBtu Space Heater H-2-3
0.56 mmBtu Air Make Up Unit A-2-3	0.01 mmBtu Space Heater H-2-4
0.56 mmBtu Air Make Up Unit A-2-4	Eight (8) 0.10 mmBtu Space Heaters H-2-5 thru H-2-12 (0.80 mmBtu total)
0.56 mmBtu Air Make Up Unit A-2-5	0.05 mmBtu Water heater W-2-1
0.06 mmBtu Space Heater H-2-1	

Class C Natural Gas Combustion Units

0.58 mmBtu Air Make Up Unit A-1-1	0.15 mmBtu Space Heater ID6
0.58 mmBtu Air Make Up Unit A-1-2	0.25 mmBtu Space Heater ID64
0.58 mmBtu Air Make Up Unit A-1-3	0.25 mmBtu Space Heater ID65
0.58 mmBtu Air Make Up Unit A-1-4	Six (6) 0.10 mmBtu Space Heaters ID14, ID32 through ID35 (0.60 mmBtu total)
0.2 mmBtu Space Heater ID3	0.03 mmBtu Water heater ID10
0.15 mmBtu Space Heater ID6	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.23	0.23	0.02	3.07	0.17	2.58

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Emission Limitations Requried for FESOP
Company Name: Four Winds International, Inc.
Address City IN Zip: 701 CR 15, Elkhart, IN 46516
FESOP/ENSR: 039-10568-00220
Reviewer: Phillip Ritz/EVP
Date: 2/1/99

Uncontrolled Potential Emissions (tons/year) for Modification and Existing Units

	Emissions Generating Activity								
Pollutant	Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1	Class A Subassembly Operations SR3, SR4, SR5, SR6, FA3, FA4, CC2, CC3 and FF2	Welding Operations FA2	Welding Operations SR2	Natural Gas Combustion	Existing Source Surface Coating	Existing Source Woodworking Operations	Existing Source Welding	**TOTAL**
PM	23.07	11.21	1.12	0.56	0.23	10.06	13.23	2.32	61.8
PM10	23.07	11.21	1.12	0.56	0.23	10.06	13.23	2.32	61.8
SO2	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.0
NOx	0.00	0.00	0.00	0.00	3.07	0.00	0.00	0.00	3.1
VOC	92.37	0.00	0.00	0.00	0.17	159.10	0.00	0.00	251.6
CO	0.00	0.00	0.00	0.00	2.58	0.00	0.00	0.00	2.6
total HAPs	52.99	0.00	0.04	0.02	0.00	82.03	0.00	0.57	135.7
all single HAP	18.18 (glycol ether)	0.00	0.04 (Manganese)	0.022 (Manganese)	0.00	31.35 (Methlyene Chloride)	0.00	0.27 (Chromium)	31.35 (Methlyene Chloride)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled and Limited Potential Emissions (tons/year) for Modification and Existing Units

	Emissions Generating Activity								
Pollutant	Surface Coating Operations SC1, FA1, CC1, SR1, WC1 and FF1	Class A Subassembly Operations SR3, SR4, SR5, SR6, FA3, FA4, CC2, CC3 and FF2	Welding Operations FA2	Welding Operations SR2	Natural Gas Combustion	Existing Source Surface Coating	Existing Source Woodworking Operations	Existing Source Welding	**TOTAL**
PM	9.83	10.51	1.12	0.56	0.23	4.44	13.23	2.32	42.2
PM10	9.83	10.51	1.12	0.56	0.23	4.44	13.23	2.32	42.2
SO2	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.0
NOx	0.00	0.00	0.00	0.00	3.07	0.00	0.00	0.00	3.1
VOC	36.34	0.00	0.00	0.00	0.17	62.59	0.00	0.00	99.1
CO	0.00	0.00	0.00	0.00	2.58	0.00	0.00	0.00	2.6
total HAPs	9.34	0.00	0.04	0.02	0.00	14.45	0.00	0.10	24.0
all single HAP	5.74 (glycol ether)	0.00	0.04 (Manganese)	0.022 (Manganese)	0.00	9.90 (Methlyene Chloride)	0.00	0.27 (Chromium)	9.90 (Methlyene Chloride)

To maintain compliance with 326 IAC 2-8, the source must limit VOC, any single HAP, and total HAPs to less than 100, 10, and 25 tons per year, respectively.

A sourcewide **39.3%** percent limitation of VOC will limit total HAP emissions to less than 100 tons per year.
A sourcewide **17.6%** percent limitation for total HAPs will limit total HAP emissions to less than 25 tons per year.
A sourcewide **31.6%** percent limitation for total HAPs will limit any single HAP emissions to less than 10 tons per year.